

May 24, 2022

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Hon. Kiyo A. Matsumoto
United States District Court Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Broecker et al. v. New York City Department of Education, et al., 21-cv-6387

Dear Judge Matsumoto:

We represent defendants United Federation of Teachers, Local 2, AFT, AFL-CIO (the “UFT”), UFT President Michael Mulgrew (the “UFT Defendants”), the Council of School Supervisors & Administrators, Local 1, AFSA, AFL-CIO (the “CSA”), and CSA President Mark Cannizzaro (the “CSA Defendants”), in the above-referenced matter. Pursuant to Your Honor’s Individual Rule III.C(1)(c) and the briefing schedule adopted on March 7, 2022, enclosed please find two courtesy copies each of the following documents, which had previously been served and today electronically filed on the docket:

- The Notice of Motion for Defendants UFT, Michael Mulgrew, CSA, and Mark Cannizzaro to dismiss the Amended Complaint;
- A memorandum of law in support of this motion;
- A reply memorandum of law in further support of the motion; and
- Affidavits of service for the aforementioned documents.

Respectfully submitted,

/s/ DINA KOLKER

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CC: all counsel of record (via ECF)